

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Revision of the Commission's Rules to Ensure)	
Compatibility with Enhanced 911 Emergency)	CC Docket No. 94-102
Calling Systems)	
)	
Cable & Communications Corporation)	
Petition for Waiver of Section 20.18(g)(1)(v))	
of the Commission's Rules)	

To: Chief, Wireless Telecommunications Bureau

PETITION FOR WAIVER

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December 13, 2005

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**SUMMARY OF
PETITION FOR WAIVER
OF
CABLE & COMMUNICATIONS CORPORATION**

Cable & Communications Corporation ("C&CC") is a Tier III carrier operating in sparsely-populated areas of rural Montana and North Dakota. Over the vast majority of C&CC's service territory, no alternative wireless service exists. No PSAP serving these rural areas has requested either Phase I or Phase II E911 functions or services.

C&CC has only recently completed its digital overlay; similarly, the company has only recently determined that a handset solution is the only technically and financially feasible methodology for the provision of Phase II automatic location information ("ALI"). Although it has sold only tri-mode ALI-compliant handsets for the past year, only 30.5% of its subscriber base currently utilize these phones. Accordingly, C&CC cannot meet the December 31, 2005 requirement for 95% subscriber penetration and respectfully requests waiver of that deadline.

C&CC has aggressive plans to increase compliant handset penetration. It will (1) institute a deep-discount marketing program, together with a consumer education campaign; and (2) improve handset reception and digital coverage. It is anticipated that these efforts will help persuade reluctant subscribers to trade the more powerful analog bag-phones for the lower power digital handsets. Nonetheless, C&CC is concerned that any deadline for handset penetration levels may well be unattainable as long as functioning analog phones are in the hands of the public -- unless C&CC were to discontinue analog service (within the Commission's guidelines).

However, C&CC believes that this drastic action would, in fact, jeopardize public health and safety and, accordingly, C&CC is unwilling to commit to this course. Furthermore, implementation of a redundant network-based ALI solution would be financially prohibitive and threaten the continuation of mobile service in any form.

The unique characteristics of its service provision and service area warrant a waiver of the 95% deadline until such time as C&CC's subscribers, who will be fully informed of the consequences of their individual choices, are induced to trade analog for digital phones. Currently, inasmuch as no PSAP within the C&CC cellular service area can make use of enhanced location information, there is no public interest to be served by immediate or near-term enforcement of penetration deadlines. Analog phone attrition and improving digital service will play important roles in subscriber conversion. Accordingly, C&CC proposes the following benchmarks: 50% penetration by December 31, 2006; 75% penetration by December 31, 2007; and, if by March 31, 2008, it appears that the 95% benchmark cannot be obtained by June 30, 2008, C&CC shall provide a detailed report explaining the impediments to meeting that requirement.

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Revision of the Commission's Rules to Ensure
Compatibility with Enhanced 911 Emergency
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Cable & Communications Corporation
Petition for Waiver of Section 20.18(g)(1)(v)
of the Commission's Rules

CC Docket No. 94-102

To: Chief, Wireless Telecommunications Bureau

PETITION FOR WAIVER

Cable & Communications Corporation ("C&CC"), pursuant to Sections 1.3 and 1.925 of the Commission's Rules,¹ hereby requests temporary waiver of the Phase II enhanced 911 ("E911") obligations set forth in Section 20.18(g)(1)(v) of the Commission's Rules.² Waiver is warranted because application of the Rule to C&CC undermines its purpose, is unduly burdensome, and is otherwise contrary to the public interest. To implement the underlying intent of the rule, C&CC proposes an alternative and specific deployment schedule and commits to submitting quarterly reports to inform the Commission of its progress toward compliance. In support of this request, C&CC demonstrates the following:

¹ 47 C.F.R. §§ 1.3 and 1.925.

² 47 C.F.R. § 20.18.

I. Background

C&CC, a “Tier III” carrier,³ is a wholly-owned subsidiary of Mid-Rivers Telephone Cooperative, Inc, a telephone cooperative serving approximately 30,000 square miles in rural Montana. C&CC serves “fill-in” cellular markets – i.e., service areas abandoned by the original cellular licensees. Throughout its estimated 10,000 square mile cellular service area, there exists competitive wireless service in only one small town, accounting for a mere 10 % of C&CC’s total service area. Serving the most rural portions of four different Rural Service Areas (“RSAs”) spread over 14 counties, and under the jurisdiction of 9 distinct PSAPs, C&CC serves, on average, fewer than one (1) subscriber per square mile. No Phase I or Phase II E911 request has been received by C&CC; conventional 911 capabilities are universally available and utilized by subscribers, to the recognized benefit of C&CC subscribers as well as the general public.⁴

Because C&CC provides the only wireless service across vast geographic expanses which constitute the overwhelming preponderance of its own service territory, it is likely unique among US carriers. Similarly, its customer base likely is unique, with approximately 58% of commercial subscribers taking advantage of C&CC's lower-cost "safety" plans, minimum-use plans designed primarily to provide emergency communications capabilities. The isolation of C&CC's most rural subscribers, and subscribers' driving patterns which generally include longer journeys over largely vacant roads, combine to produce a distinctive public interest requirement for the preservation of access to the only source of mobile service.

³ See Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Phase II Compliance Deadlines for Non-Nationwide Carriers, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841, 14848 ¶ 23 (2002) (“*Non-Nationwide Carriers Order*”) (defining Tier III carriers as all wireless carriers with fewer than 500,000 subscribers).

⁴ See *infra* Section II.B.

C&CC initiated the provision of wireless service to this area largely because many of the cooperative's wireline member-subscribers had no access to wireless services. Accordingly, while C&CC's provision of wireless service is not motivated solely by the pursuit of profit, the small number of subscribers mandates strict cost control to ensure that service may be maintained and expanded. This concept is reflected in C&CC's system design, consisting of distinct "string-of-pearls" cell-site configurations, utilizing omni-directional antennas to maximize coverage per cell site.

In addition, a large proportion of C&CC's subscriber base maximizes the system's capabilities by continued utilization of the once-prevalent three-watt analog "bag phones" which provide broader geographic access to C&CC's system than lower-powered hand-held mobile telephones. These higher-powered analog phones are not ALI-compliant, and C&CC has found that subscribers are extraordinarily reluctant, if not adamantly opposed, to relinquish this equipment.

Network design and customer equipment choices dictated C&CC's initial election of a network-based ALI solution, there being no ALI-capable analog handsets readily available.⁵ Market changes and regulatory imperatives have, however, caused C&CC to commit significant time and capital to overlaying its analog cellular service with digital CDMA technology. That overlay was only recently completed.

⁵ The primary reason C&CC originally chose a network-based ALI solution was its recognition that subscribers' access to wireless service within its then-existing current network configuration would suffer if the three-watt analog "bag" phones were abandoned. *See Cable & Communications Corporation* (TRS# 812411), Revision to E911 Phase II Implementation Report, filed Sept. 14, 2001, supp. Oct. 12, 2001. *See also Cable & Communications Corporation* E911 Phase II Interim Implementation Report, filed Aug. 1, 2003 (reporting likelihood that Angle-of-Arrival ALI technology would be utilized, but noting potential obstacles to implementation of that methodology).

The addition of a CDMA interface has allowed C&CC's reconsideration of implementing a handset-based ALI system. After reviewing all alternatives for implementing Phase II E911 capabilities currently available to C&CC, the determination has been made and is hereby reported to alter its originally proposed network-based ALI solution and, instead, implement a handset-based solution. Questions of accuracy aside, the costs of implementing a network-based ALI solution in response to a future PSAP request remain prohibitive,⁶ and implementation of such a solution would jeopardize the financial integrity of a system which is the only source of mobile communications within approximately 90% of its 10,000 square mile service area. Accordingly, C&CC plans to implement a handset-based ALI solution in response to future Phase I and Phase II E911 requests from the relevant PSAPs.

In advance of the scheduled CDMA overlay finalization, C&CC initiated the sale of tri-mode handsets, in part due to the demand of many of its subscribers who had encountered difficulties roaming with analog phones outside the C&CC service area, and in part due to the dwindling availability of analog phones. For approximately one year, C&CC has sold only ALI-compliant handsets and, as a result, approximately 30.5% of the handsets currently utilized by C&CC subscribers⁷ are digital and ALI-compliant; all new handsets activated for its subscribers are ALI-compliant. Nonetheless, with its CDMA interface only now coming on line, it is clear

⁶ See Comments of Cable & Communications Corporation filed January 24, 2003 in response to *Wireless Telecommunications Bureau Seeks Public Comment on Petition for Forbearance From E911 Accuracy Standards Imposed on Tier III Carriers*, WT Docket No. 02-377, Public Notice, DA 02-3470 (rel. Dec. 17, 2002).

⁷ Anecdotally, C&CC is aware that a number of its subscribers utilize both digital and analog handsets to take advantage of analog coverage and digital features. Accordingly, C&CC does not currently have an accurate count of subscribers who utilize only analog handsets, but is developing a survey to solicit information from its current subscribers regarding their utilization of and attachment to the 3-watt analog bag phones currently in circulation. C&CC anticipates that this survey will be conducted shortly, and its results will be reported to the Commission.

that C&CC will be unable to meet the upcoming 95% subscriber penetration requirement of Section 20.18(g)(1)(v) of the Commission's Rules. Accordingly, C&CC requests waiver of the December 31, 2005 deadline consistent with the Commission's guidelines, and submits that grant of this waiver serves the public interest.

II. Waiver is Warranted

The Commission has recognized the extraordinary circumstances facing all Tier III carriers attempting to implement a Phase II E911 solution, including financial challenges, small customer base,⁸ and a difficult or vast terrain "along with a corresponding reduced customer willingness to forgo existing handsets that may provide expanded range, but are not location-capable."⁹ C&CC experiences the extreme of each of these circumstances, and, accordingly, its factual circumstances, as demonstrated above, justify the requested waiver.

The standard for grant of a waiver of the Commission's Rules is that "in view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative."¹⁰ Waiver is appropriate if special circumstances warrant a deviation from the general rule and such deviation will serve the public interest, if the underlying purpose of the rule would be frustrated by application in a specific case, or, in view of unique or unusual factual

⁸ See e.g., Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Phase II Compliance Deadlines for Tier III Carriers, CC Docket No. 94-102, *Order*, 20 FCC Rcd 7709 (2005); *Non-Nationwide Carriers Order*, 17 FCC Rcd at 14846.

⁹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Systems; Petitions for Waiver of Enhanced 911 Phase II Requirements, CC Docket No. 94-102, *Order* at ¶ 8 (rel. Oct. 28, 2005) (citation omitted).

¹⁰ 47 C.F.R. § 1.925(b)(3)(ii).

circumstances, application of the rule(s) would be inequitable, unduly burdensome, or contrary to the public interest, or the applicant has no reasonable alternative.¹¹ C&CC's waiver request meets each of these criteria.

A. Special Circumstances Warrant Deviation to Serve the Public Interest; Application of the Rule Is Unduly Burdensome

The timing of the current CDMA project is a function of a variety of factors, including the availability of financing. Initiation of the interface overlay project was delayed, in part, due to the lengthy state eligible telecommunications carrier ("ETC") proceeding, undertaken by C&CC to enable it to receive and utilize available federal funding for its continued and improved provision of universal service offerings. More than twenty months after its application, C&CC was designated by the Montana Public Service Commission as an ETC in April, 2005.¹²

C&CC has only recently finalized the launch of its digital CDMA interface. The current low rate of compliant handsets is a direct and predictable result of the fact that handset conversion is not an attractive option for most subscribers until the system supports the digital functionality offered by the CDMA interface. Any marketing effort would have been premature and, more importantly, likely to have led to customer confusion and frustration.

With the new technology launch, C&CC will initiate a series of subscriber outreach efforts, designed to (1) educate subscribers regarding the benefits of digital handsets, including prominent and detailed discussions of the E911 benefits of ALI-capable phones; and (2) induce

¹¹ See *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969), *appeal after remand*, 459 F.2d 1203 (D.C. Cir. 1972), *cert. denied*, 409 U.S. 1027 (1972); *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164 (D.C. Cir. 1990).

¹² See *In the Matter of Cable & Communications Corporation, dba Mid-Rivers Cellular*, Petition for Designation as an Eligible Telecommunications Carrier, Docket No. D2003.8.105, *Final Order No. 6518a*, (MT PSC) (rel. April 5, 2005) (proceeding hereinafter referred to as "ETC Proceeding"). As of the date of this filing, however, no USF funding has been received.

handset upgrades through offering financial incentives, including substantial discounts on new handsets (where service commitments are extended). Although only compliant phones are activated now, it is clear that the 95% penetration rate cannot be achieved by December 31, 2005.

As many carriers have demonstrated and the Commission itself has recognized, subscribers will be extremely reluctant to trade a high-powered analog telephone for a compliant digital handset, given the decreased reliability and coverage which will result.¹³ Given its new launch, and the likely response of its subscriber base, C&CC projects that it will reach a 50% penetration rate within the next year, and requests an extension of time until December 31, 2006 to meet this milestone.

Throughout the next year, C&CC will institute aggressive education and incentive efforts to encourage subscribers to switch to newer digital phones. C&CC has launched a campaign to provide a free digital phone to new subscribers or those who extend their current contracts. Advertisements will be placed in the customers' newsletters, local newspapers and on the local cable company's community advertisement channel. C&CC believes that this aggressive effort may well result in a 50% penetration level within the coming year.¹⁴

During the second quarter of 2006, C&CC plans to promote a digital signal booster system designed to extend the signal strength ordinarily available through digital handsets.

¹³ See *supra* n. 7. C&CC anticipates that its survey will provide information related to current subscriber use, in addition to information regarding future actions, including the likelihood that a subscriber will cancel service if handset upgrade is required. Although C&CC plans network upgrades which will increase digital coverage, C&CC believes that a large number of subscribers will nonetheless cancel service if confined to digital handsets and, accordingly, the number of subscribers with decreased access to emergency services will be high.

¹⁴ As noted above, 58% of C&CC's current customer base subscribes to safety plans, and C&CC suspects that few among this group of subscribers will see any benefit to modifying their service arrangements. Although persistent and targeted marketing likely will convert some users to digital technology, and new subscribers are confined to digital technology, C&CC recognizes that its 50% penetration projection may be overly optimistic.

Unfortunately, C&CC anticipates that the demand for this upgrade likely will be limited, because its current price to subscribers, even with significant mark-downs for equipment, is just under \$300.

In addition, system expansion and improvement plans will generate stronger digital signals, gradually reducing dependence on analog technology for geographic coverage. Over the next five years, C&CC plans to add 7 cell sites and 4 cell extender sites to provide for broader and stronger system operations. With these additional steps, and attrition, C&CC will strive to achieve a 75% penetration rate of ALI-compliant phones by December 31, 2007.

C&CC submits that strict application of the 95% penetration rule is unduly burdensome and would undermine the very purpose of emergency services rules. Implementation of a network solution to accommodate the analog users could well bankrupt the company. Although it will make every effort to saturate its market, C&CC suggests that it may be impossible to reach a 95% penetration rate as long as existing analog phones remain in working order.¹⁵

Furthermore, although C&CC intends to institute aggressive education and incentive efforts, as well as improve and expand its CDMA coverage to reduce the differential between analog and digital coverage, C&CC submits that termination of analog service within the Commission's requirements,¹⁶ a viable option in terms of ensuring that it could comply with the Commission's penetration requirement, would be anathema to the public interest and disserve every resident

¹⁵ Given that manufacturers have long ceased support of the 3-watt bag phone, the availability of parts has dwindled and, accordingly, it is increasingly difficult to repair these phones. Nonetheless, these phones have shown a remarkably long life and their disappearance within the next several years is highly unlikely.

¹⁶ Section 22.901(b) of the Commission's Rules currently establishes February 18, 2008 as the sunset date for the obligation to provide analog service.

and roamer within its 10,000 square-mile service area. Accordingly, C&CC reports that it has no current plans to take such action.

**B. Absent Waiver, the Underlying Purpose of the Rule Would Be Frustrated;
No Reasonable Alternative to Waiver Exists**

Without a waiver, C&CC would be compelled to either abandon analog service or construct an expensive and redundant ALI system for the benefit of an ever-dwindling user base,¹⁷ a move which would jeopardize the financial integrity of its entire system,¹⁸ and threaten the only mobile service to approximately 9000 square miles in rural Montana and North Dakota. Neither alternative serves the underlying purpose of the E911 rules.

C&CC is committed to work diligently toward compliance with the 95% penetration rate, but suggests that, under the unique circumstances of its operations and its service area, an arbitrary deadline may not be realistic. It is clear, however, that the combination of new subscribers and bag-phone failure will ultimately result in full compliance with the established penetration rate. Accordingly, the ultimate question is whether, under these unique circumstances, the arbitrary penetration rate should dictate actions which could, ironically, jeopardize the provision of all mobile emergency communications over a huge swath of rural Montana and a portion of rural North Dakota.

The purpose of the Commission's E911 rules is to promote public safety by providing mobile telecommunications to consumers with increased and improved access to emergency

¹⁷ C&CC has no information as to whether PSAPs could or would support a redundant system.

¹⁸ As C&CC candidly reported to the Montana Public Service Commission in the ETC Proceeding, financing concerns and governmental mandates which result in the company's inability to absorb additional costs, or the inability to sustain an appropriate revenue level, or any combination of the two, could negatively influence expansion plans, and a significant change in circumstances or climate could require that specific sites be turned down or that operations cease altogether. See C&CC Response to Public Service Commission's Staff Data Request PSC-015(b).

responders. The premise which underlies this goal, and the necessary predicate to implementation of these rules, is the existence of mobile service.

As demonstrated above, C&CC is the sole provider of mobile service throughout the vast majority of its service area. Moreover, throughout its licensed history, C&CC has regularly expanded its service territory, continually adding cell sites to expand mobile service into additional, unserved, sparsely populated areas. Continuation of existing operations, let alone continued expansion of operations, would be jeopardized by the requirement to make the capital commitment necessary to support a network based ALI solution for a dwindling but, as the Commission recognizes, determined, analog consumer base.

It is important to emphasize that no area PSAP within the C&CC cellular service area has requested either Phase I or Phase II E911 information.¹⁹ Accordingly, there is no immediate negative public interest implication in the grant of the request waiver. Furthermore, C&CC does not, through this waiver request, attempt to shirk its obligations to provide enhanced emergency response capabilities to its subscribers. Its recent system-wide upgrade will make E911 features available to an ever increasing number of subscribers. C&CC's waiver request is intended to preserve the financial integrity of the sole source of access to any emergency services over a vast geographic area.²⁰ The public interest is not served by sacrifice of basic communications capabilities in an attempt to achieve technical sophistication.

¹⁹ C&CC has and will continue to work closely with area PSAPs.

²⁰ C&CC notes that there is no state-funded E911 cost recovery fund available to wireless carriers in Montana.

Congress concurs in this assessment, as reflected by the passage of the "Ensuring Needed Help Arrives Near Callers Employing 911 Act of 2004" ("ENHANCE 911 Act").²¹ The ENHANCE 911 Act requires the Commission to grant a qualified Tier III carrier's request for waiver of the handset penetration deadlines if "strict enforcement . . . would result in consumers having decreased access to emergency services."²²

Extraordinary expenses leading to system shutdown would strand more than 2000 subscribers, their families, and their neighbors. During the ETC Proceeding, numerous public officials testified that the C&CC communications system is vital to public health and safety.²³ Under these circumstances, the clear public interest is served by the grant of the requested waiver.

C. Proposed Waiver Timetable and Conditions

Given the special circumstances confronted by C&CC, unique among even Tier III carriers, waiver of the December 31, 2005 deadline as requested herein is warranted. C&CC commits to provide the Commission with quarterly progress reports, and submits that its efforts toward compliance should give rise to a presumption that a well-documented future extension request warrants favorable consideration.

Specifically, C&CC proposes that it be permitted to inaugurate and promote an education and promotion schedule which will result in a 50% penetration rate by December 31, 2006,

²¹ Pub. L. No. 108-494, 118 Stat. 3986 (2004).

²² *Id.* at § 107(a), 118 Stat. 3986, 3991.

²³ See, e.g., testimony of Carter County Commissioner Markuson emphasizing the public benefit of C&CC's service: "I can name any number of cases where cellular telephone in our area has saved lives" (ETC Proceeding Transcript pp. 99-100); see also Fallon County Commissioner Rieger noting the importance of C&CC's augmentation of emergency service communications: "The communications of radios, such as the fire department use and ambulance, sometimes does not reach into these areas, and the cell phone is the last viable source of communication" (*id.* at 101); Commissioner Kelly: "Cellular services in rural areas is our lifeline in times of emergency and disasters" (*id.* at 109-111).

reaching a 75% penetration rate by December 31, 2007. If the 95% benchmark appears to be unobtainable by June 30, 2008, C&CC shall, no later than March 31, 2008, file a detailed report and request for further extension of the existing waiver.

This proposed deployment schedule is consistent with the Commission's approach in originally adopting phased-in obligations for carriers choosing a handset-based solution. As the Commission previously found, even a 4-year, 3-month transition period for full ALI-compliant penetration was "overly ambitious, in view of consumers that may wish to continue to use their non-ALI capable handsets, even if newer handsets provide location as well as other advanced features."²⁴ Under that rationale, C&CC's proposed deployment schedule is both reasonable and consistent with past Commission practices.

III. Conclusion

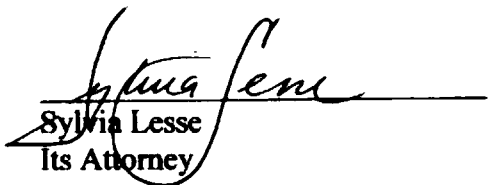
C&CC has initiated an upgrade which required review of previous business decisions related to E911 compliance. Having proceeded in an orderly and reasonable manner to implement this upgrade, its election of E911 compliance methodology has changed, rendering it unable to meet the handset penetration deadline of December 31, 2005. Waiver of that deadline consistent with the proposed schedule would further the public interest by ensuring that while a

²⁴ In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems; *Fourth Memorandum Opinion and Order*, CC Docket No. 94-102, ¶ 36 (rel. Sept. 8, 2000).

good faith effort to meet the obligation with all due speed is underway, existing emergency services capabilities are not jeopardized. Accordingly this Petition should be granted.

Respectfully submitted,

CABLE & COMMUNICATIONS CORPORATION

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December 13, 2005

DECLARATION OF GERRY ANDERSON

I, Gerry Anderson, General Manager of Cable & Communications Corporation, do hereby declare under penalty of perjury that I have read the foregoing "Petition for Waiver of Section 20.18(g)(1)(v) of the Commission's Rules" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

Dec. 12, 2005
Date


Gerry Anderson

Certificate of Service

I, Sylvia Lesse, of Counsel to the law firm of Kraskin, Moorman and Cosson, hereby certify that on this 13th day of December, 2005, I caused to be delivered, via first-class US mail, postage prepaid, a copy of the foregoing "Petition for Waiver of Cable & Communications Corporation" on the following:

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PSAP Carter County, Montana
PSAP for Prairie County, Montana
PSAP for Wibaux County, Montana
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